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January 11, 2006

VIA CM/ECF AND HAND DELIVERY

The Honorable Gregory M. Sleet
United States District Court
844 North King Street
Wilmington, DE 19801

RE: Lieberman v. State of Delaware, et al.
U.S.D.C., C.A. No. 96-523-GMS

Dear Judge Sleet:

We have today electronically filed the following documents:

1. A proposed, joint Final Pretrial Order;
2. Proposed Jury Instructions;
3. Plaintiff Elberta Bernice Lieberman's Proposed Jury Interrogatories;
4. Plaintiff Elberta Bernice Lieberman's Proposed Special Voir Dire Questions, and
5. Defendant's Proposed Jury Interrogatories.

With his consent, we have signed Mr. Niedzielski's name to the proposed Final Pretrial Order. Enclosed are the appropriate copies of these documents along with diskettes of the documents in WordPerfect format. Also enclosed for Your Honor are a set of plaintiff's trial exhibits.

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We appreciate that we also need a trial brief and *in limine* motions. Those will follow in a few days, well before the January 31, 2006 pretrial conference.

Respectfully Submitted,


Edward M. McNally (#614)

EMM/lpt

Enclosures

cc: Clerk of the District Court (via CM/ECF)
Marc P. Niedzielski, Esquire (via CM/ECF)